

**IN THE DRAWINGS**

Applicants submit herewith replacement Figures 32 and 53 in compliance with 37 C.F.R. 1.121(d).

## REMARKS

The drawings were objected to by the examiner due to certain misspelled words therein. Corrected drawings are submitted with this response. Withdrawal of the rejection with respect to the amended drawings is respectfully requested.

Claims 16-32 have been canceled in the present amendment without prejudice to their underlying subject matter. Applicants reserve the right to pursue the subject matter of these claims in this or any other application.

New claims 42-45 have been added. No new subject matter has been added. Support for the amendments can be found at, e.g., page 24, line 20 – page 25, line 15 and at page 54, line 17 – page 56, line 21 of the application.

Claims 12-15 stand rejected under 35 U.S.C. § 101 because the claims are allegedly drawn to a “mental process.” This rejection is traversed. Claim 12 explicitly recites that each of the calculating steps are performed using “an artificial intelligence network.” This limitation precludes the possibility that the steps of the claim are simply a “mental process” because an *artificial* intelligence network, by definition, excludes a mental process performed by a human being. Moreover, applicants respectfully submit that the § 101 rejection in this case is simply a “technological arts” rejection of the type that is precluded by the decision of the Board of Patent Appeals and Interferences in *Ex parte Lundgren*, 76 U.S.P.Q.2d 1385, 1388 (B.P.A.I. 2005). Accordingly, for both of the foregoing reasons, applicants respectfully request withdrawal of the rejection.

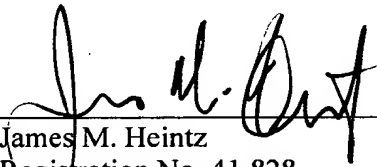
Claims 13 and 14 stand rejected under 35 U.S.C. § 102 as being anticipated by Biswas. This rejection is traversed. Claim 13 (from which claim 14 depends) has been amended to include the limitations of dependent claim 16. Claim 16 was rejected as obvious over the combination of Biswas and the “Installation Force Protection Guide” (the “IFPG”). This rejection is also traversed. Claim 13 requires the calculation of an “accessibility determined

from a model of the physical environment of the site” at which the risk of a terrorist attack is being assessed. This step is neither taught nor suggested by either Biswas or IFPG. Biswas does not discuss anything having to do with a terrorist attack. IFPG does not disclose anything concerning the calculation of accessibility based on a physical model of the site as required by claim 13. The IFPG provides general guidelines by which facilities may be constructed but does not involve the calculation of any accessibility as required by the claims. Moreover, while diagrams of various sites are shown for the sake of illustration, there is no disclosure in IFPG of creating or maintaining any model of a site.

In light of the foregoing, applicants submit that the application is now in condition for examination on the merits. Early notification of such action is earnestly solicited. Should the Examiner have any suggestions to place the application in even better condition for allowance, Applicants request that the Examiner contact the undersigned representative at the telephone number listed below.

Respectfully submitted,

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